

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

District of Nevada

Civil Division

FILED	RECEIVED
ENTERED	SERVED ON
COUNSEL PARTIES OF RECORD	
SEP 29 2022	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: <i>JA</i>	DEPUTY

Sade Renee El in proper persona sui juris

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Stephanie Ann Charter, CHILD FAMILY SERVICES
et al.,

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. 2:21-cv-01910-APG-DJA

(to be filed in by the Clerk's Office)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Sade Renee El
Street Address	9308 South Chicago ave 491
City and County	Chicago
State and Zip Code	Illinois Republic [60617]
Telephone Number	415 684 2289
E-mail Address	sade.kellogg@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	STEPHANIE ANN CHARTER
Job or Title (if known)	acting as magistrate EIGHTH JUDICIAL FAMILY COURT
Street Address	601 Pecos Road
City and County	las vegas, clark county
State and Zip Code	Nevada Republic [89115]
Telephone Number	(702) 455-0032
E-mail Address (if known)	deptylc@clarkcountycourts.us

Defendant No. 2

Name	STEVEN B WOLFSON
Job or Title (if known)	acting as CLARK COUNTY DISTRICT ATTORNEY
Street Address	601 north pecos road suite 470
City and County	las vegas, clark county
State and Zip Code	Nevada Republic [89101]
Telephone Number	(702) 280-7715
E-mail Address (if known)	unknown

Defendant No. 3

Name	STEPHANIE RICHTER
Job or Title (if known)	acting as chief deputy attorney CLARK COUNTY
Street Address	601 north pecos road suite 470
City and County	las vegas, clark county
State and Zip Code	Nevada Republic [89101]
Telephone Number	(702) 280-7715
E-mail Address (if known)	unknown

Defendant No. 4

Name	EIGHTH JUDICIAL FAMILY COURT LAS VEGAS
Job or Title (if known)	Child/Human Trafficking Business/ Corporation
Street Address	601 north pecos road
City and County	las vegas, clark county
State and Zip Code	Nevada Republic [89101]
Telephone Number	unknown

ADDITIONAL DEFENDANTS
ATTACHMENT # 1

Defendant No.5

Name: S GUERRA #18286

Job or Title (If Known): (acting as) (Policy Enforcer Las Vegas Metropolitan Police Department)

Street Address: 400 south martin luther king boulevard

City and County: las vegas, clark county

State and Zip Code Nevada Republic [89106]

Telephone Number (If Known) (702) 828-2294

Defendant No.6

Name: P. ANDERSON #16266

Job or Title (If Known): (acting as) (Policy Enforcer Las Vegas Metropolitan Police Department)

Street Address: 400 south martin luther king boulevard

City and County: las vegas, clark county

State and Zip Code: Nevada Republic [89106]

Telephone Number (If Known) : (702) 828-2294

Defendant No.7

Name: ADRIANA RINCON WHITE

Job or Title (If Known): (acting as) (Magistrate Eighth Judicial Family Court Las Vegas)

Street Address: 601 north pecos road

City and County: las vegas, clark county

State and Zip Code: Nevada Republic [89115]

Telephone Number (If Known) : unknown

Defendant No.8

Name: BELINDA T.HARRIS

Job or Title (If Known): (acting as) (Magistrate Eighth Judicial Family Court Las Vegas)

Street Address: 601 north pecos road

City and County: las vegas, clark county

State and Zip Code: Nevada Republic [89115]

Telephone Number (If Known) : unknown

Defendant No.9

Name: NICHOLAS EASON

Job or Title (If Known): (acting as) (case worker child family services las vegas)

Street Address: 601 north pecos road

City and County: las vegas, clark county

State and Zip Code: Nevada Republic [89115]

Telephone Number (If Known) : (702) 455-2028

Email : Nicholas.eason@clarkcountynv.gov

Defendant No.10

Name: MICHELLE PELINO

Job or Title (If Known): (acting as) (case worker child family services las vegas)

Street Address: 601 north pecos road

City and County: las vegas, clark county

State and Zip Code: Nevada Republic [89115]

Telephone Number (If Known) : (702) 455-8062

Email : michelle.pelino@clarkcountynv.gov

Defendant No.11

Name: TISHA EVANS

Job or Title (If Known): (acting as) (case worker child family services las vegas)

Street Address: 601 north pecos road

City and County: las vegas, clark county

State and Zip Code: Nevada Republic [89115]

Telephone Number (If Known) : unknown

Email : evanst@clarkcountynv.gov

Defendant No.12

Name: SHALONDA ADAMS

Job or Title (If Known): (acting as) (case worker child family services las vegas)

Street Address: 601 north pecos road

City and County: las vegas, clark county

State and Zip Code: Nevada Republic [89115]

Telephone Number (If Known) : (702) 455-5739

Email : Shalonda.adams@clarkcountynv.gov

Defendant No.13

Name: PAYA PATEL

Job or Title (If Known): (acting as) (clark county district attorney)

Street Address: 601 north pecos road suite 470

City and County: las vegas, clark county

State and Zip Code: Nevada Republic [89115]

Telephone Number (If Known) : unknown

Email: paya.patel@clarkcounty.org

Defendant No.14

Name: JOE LOMBARDO

Job or Title (If Known): (acting as) (las vegas Sheriff)

Street Address: 400 south martin luther king boulevard

City and County: las vegas, clark county

State and Zip Code: Nevada Republic [89106]

Telephone Number (If Known) : (702) 828-3111

Defendant No.15

Name: BETH ROSENBLUM

Job or Title (If Known): (acting as) (clark county public defender)

Street Address: 1291 galleria drive suite 230

City and County: Henderson

State and Zip Code: Nevada Republic [89014]

Telephone Number (If Known) : unknown

Defendant No.16

Name: NICK PETAS

Job or Title (If Known): (acting as) (non-profit children's attorney)

Street Address: unknown

City and County: las vegas, clark county

State and Zip Code: Nevada Republic [89115]

Telephone Number (If Known) : unknown

Email : npetsas@lacsu.org

Defendant No. 17

Name: DYDIA GARCIA

Job or Title (If Known): acting as agent for CHILD FAMILY SERVICES LAS VEGAS

Street Address: South Visitation Site

City and County: las vegas, clark county

State and Zip Code: Nevada Republic [unknown]

Telephone Number (If Known): (702) 455-1814

Email: Unknown

E-mail Address (if known) unknown

Please see Attachment #1 for additional Defendants

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question☒ Diversity of citizenship☒ Human Right Violations ☒ RICO

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Treaty of Peace and Friendship of 1789 and 1836 between the Moroccan Empire and United States, Common Law, Supreme Court Rulings, Constitution of the United States of America 1789 Article 3 Section 1, 2, Constitution of the United States of America 1789 Article 6, The Constitution of Nevada Article 1, Section 1,3,5,8,16,17,18,19,20

*Continued Please see Attachment #2.

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) _____, is a citizen of the State of (name) _____.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____ and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

The defendant, (name) _____, is a citizen of
 the State of (name) _____. Or is a citizen of
 (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under
 the laws of the State of (name) _____, and has its
 principal place of business in the State of (name) _____.
 Or is incorporated under the laws of (foreign nation) _____,
 and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

* Please see Attachment #3

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

* Please see Attachment #4 amended complaint

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. **IN PROPER PERSONA, SUJURIS** For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Autograph
Date of signing:

06/03/2022

Amended
9/20/22

Sealed

Signature of Plaintiff/Petitioner

Sade Renee El

Printed Name of Plaintiff/Petitioner

Sade Renee El

B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

Attachment #2

18 U.S. Code § 242. Deprivation of rights under color of law
18 U.S. Code § 241. Conspiracy against rights
18 USC §1001 -- STATEMENTS OR ENTRIES GENERALLY
18 USC §1512B - ENGAGES IN MISLEADING CONDUCT
26 USC §7214 - OFFENSES BY OFFICERS AND EMPLOYEES OF THE UNITED STATES
42 USC §1985 (3) COUNTS - CONSPIRACY TO INTERFERE WITH CIVIL RIGHTS
18 USC §3571 (5) COUNTS - VIOLATION OF OATH OF OFFICE
18 USC §3571 DENIED PROPER WARRANT(S), DENIED RIGHT OF REASONABLE ARGUMENTS
(RECORDS)
18 USC §3571 DENIED RIGHT TO TRUTH IN EVIDENCE
18 USC §3571 SLAVERY FORCED COMPLIANCE NO CONTRACT
18 USC §3571 TREASON
18 USC §1091 GENOCIDE
18 USC §876 MAIL THREATS
18 USC §1001 FRAUD
18 USC §1001 FALSIFICATION OF DOCUMENTS
18 USC §1621 PERJURY
18 USC §1963 RACKETEERING (Criminal)
18 USC §1964 RACKETEERING (Civil)
Declaration of 1959 Rights of a Child Principal 3 and Principal 9, 25
Bill of Rights Amendment 1, Amendment 4, Amendment 5
Universal Declaration of Human Rights Articles 7,10,11,12,15,23,24,25,31,33,37
Canon Rule 1-1-1.3; Canon Rule 2 1-2.10; Canon Rule 3. 9-3.11